

ELLEN F. ROSENBLUM
Attorney General
JESSE B. DAVIS #052290
Senior Assistant Attorney General
TODD MARSHALL #112685
Senior Assistant Attorney General
KRISTEN E. HOFFMEYER #085338
Senior Assistant Attorney General
Department of Justice
100 SW Market Street
Portland, OR 97201
Telephone: (971) 673-1880
Fax: (971) 673-5000
Email: jesse.b.davis@doj.state.or.us
Todd.Marshall@doj.state.or.us
kristen.hoffmeyer@doj.state.or.us

Of Attorneys for State Defendants Hormann,
Krings, Riddle, Wilcox and Oregon State Police

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

NICHOLAS JAMES MCGUFFIN, as an
individual and as guardian *ad litem*, on behalf
of S.M., a minor,

Plaintiffs,

v.

MARK DANNELS, PAT DOWNING,
SUSAN HORMANN, MARY KRINGS,
KRIS KARCHER, SHELLY MCINNES,
RAYMOND MCNEELY, KIP OSWALD,
MICHAEL REAVES, JOHN RIDDLE, SEAN
SANBORN, ERIC SCHWENNINGER,
RICHARD WALTER, CHRIS WEBLEY,
ANTHONY WETMORE, KATHY WILCOX,
CRAIG ZANNI, DAVID ZAVALA, ESTATE
OF DAVID E. HALL, VIDOCQ SOCIETY,
CITY OF COQUILLE, CITY OF COOS
BAY, and COOS COUNTY,

Defendants.

Case No. 6:20-cv-1163-MTK (Lead Case)
3:21-cv-1719-MTK (Trailing Case)

STATE DEFENDANTS' MOTION FOR
EXTENSION OF TIME TO FILE MOTION
FOR SUMMARY JUDGMENT

VIDOCQ SOCIETY,

Cross-Claimant.

RICHARD WALTER,

Cross-Claimant.

NICHOLAS JAMES MCGUFFIN, as an
individual and as guardian ad litem, on behalf
of S.M., a minor,

Plaintiff,

v.

OREGON STATE POLICE,

Defendant.

CERTIFICATE OF CONFERRAL

Pursuant to L.R. 7-1(a)(1)(a), undersigned counsel for State Defendants conferred in good faith with the parties' counsel before filing this motion. Plaintiffs oppose this motion. The other Defendants do not oppose this motion.

MOTION FOR EXTENSION OF TIME

Defendants respectfully move for an order extending the deadline for all parties to file their dispositive motions in these consolidated matters, as well as the corresponding deadlines to file responses to those motions and replies in support of those motions. Pursuant to the Court's November 27, 2024, scheduling order (ECF 271), the current relevant deadlines are as follows:

January 7, 2025: Deadline to file dispositive motions

February 18, 2025: Deadline to file responses to dispositive motions

March 11, 2025: Deadline to file replies in support of dispositive motions.

State Defendants respectfully request each of those deadlines be extended by 21 days:

January 28, 2025: Deadline to file dispositive motions

March 11, 2025: Deadline to file responses to dispositive motions

April 1, 2025: Deadline to file replies in support of dispositive motions.

As explained in the concurrently filed Declaration of Jesse B. Davis, State Defendants request additional time because of the intensive demands of this litigation, the numerous claims, the factually intensive nature of the claims and defenses, counsel's competing demands, and the interruptions of the holidays. State Defendants anticipates that this is the last extension they will request of this deadline.

This motion is made in good faith and not for purposes of undue delay, and the requested extension is not expected to result in the delay of other deadlines.

DATED December 31, 2024.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General

s/ Jesse B. Davis

JESSE B. DAVIS #052290
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TODD MARSHALL #112685
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